

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES
LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and for the Estate of Bernard
L. Madoff.,

Plaintiff,

v.

CAROL NELSON,

Defendant.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and for the Estate of
Bernard L. Madoff,

Plaintiff,

v.

CAROL NELSON, Individually and as Joint Tenant; and
STANLEY NELSON, Individually and as Joint Tenant,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04658 (SMB)

Adv. Pro. No. 10-04377 (SMB)

DECLARATION OF ROBERT J. NELSON

I, ROBERT J. NELSON, declare as follows:

1. I am a partner in the law firm Lief Cabraser Heimann & Bernstein, LLP and a member of the New York Bar and admitted to the United States District Courts for the Southern and Eastern Districts. Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I submit this declaration in support of the accompanying notice and proposed order substituting Robert J. Nelson for Helen Davis Chaitman as counsel for defendants Carol Nelson, Individually and as Joint Tenant; and Stanley Nelson, Individually and as Joint Tenant (“Defendants”) in the above-captioned adversary proceeding. I have also read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendants have requested and consent to this substitution of counsel.

3. It is not expected that any delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on December 4, 2019.

Dated: New York, New York
December 4, 2019

/s/ Robert J. Nelson

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